

PRIVACY POLICY NOTICE - RAND ADVISORS

Rand Advisors (“Adviser”) is a United States Securities and Exchange Commission (“SEC”) registered investment adviser which serves as the investment manager to many private equity funds (“Funds”). An important part of the relationship Rand Advisors has with the Investors in these Funds is the information that is shared with us through our relationship with the Funds. Protecting the Investor’s privacy is important to us and we want our Investors to know how we treat their private information. We also know that you expect us to service you in an accurate and efficient manner. To do so, we must collect and maintain certain personal information about you. For convenience, “you” or “your” refers to any and all Investor(s) and “we,” “our,” and “us” refers to Rand Advisors.

WHAT INFORMATION WE COLLECT

We collect certain nonpublic personal identifying information from you in connection with subscription agreements or other financial product or service, whether in writing, in person, by telephone, electronically, or by other means, including but not limited to your name, address, social security number, tax ID number, bank account numbers, wiring instructions, and status as an accredited investor or qualified client.

We may also obtain information for the purpose of tax reporting to you and to the various agencies to which we report as required by law, including disclosures on various Internal Revenue Service (“IRS”) forms that we collect for tax reporting purposes.

WHAT INFORMATION WE DISCLOSE

We disclose to affiliates and non-affiliated third parties nonpublic personal information only in connection with our management of the Funds. Such disclosures include, among other things, your name, address and tax ID number. Such disclosures may be provided to affiliates and non-affiliated third parties:

- As required or necessary to carry out fully and properly the business conducted by us such as:
 - Disclosures to affiliated and non-affiliated third party service providers who perform legal, tax, compliance and audit services.
 - Processing services, and disclosures to non-affiliated third parties such as custodians.
- As required by law or legal process.
- With your consent.

All third parties must agree that they will not reuse your nonpublic information in any way other than for the purposes for which they received it and as allowed by applicable law or regulation, and they are not permitted to share or use this information for any other purpose.

We do however, reserve the right to disclose nonpublic personal information about Investors to any person or entity, including without limitation any governmental agency, regulatory authority, or self-regulatory organization having jurisdiction over us or our affiliates, if (i) we determine in our discretion that such disclosure is necessary or advisable pursuant to or in connection with any United States federal,

state or local, or non U.S., law, rule, regulation, executive order or policy, including without limitation any anti-money laundering law and the USA PATRIOT Act of 2001 and (ii) such disclosure is not otherwise prohibited by law, rule, regulation, executive order, or policy.

If you decide at some point to either terminate our services or become an inactive investor, we will continue to adhere to our privacy policy, as may be amended from time to time.

SECURITY OF YOUR INFORMATION

We restrict access to your nonpublic personal information to those employees who need to know that information in order to service your account. We maintain physical, electronic and procedural safeguards that comply with applicable federal or state standards to protect your nonpublic personal information. We regularly review, revise and update our information security program to account for changes in technology.

CHANGES TO OUR PRIVACY POLICY OR RELATIONSHIP WITH YOU

Periodically we may revise our privacy policy, and will provide you with a revised policy if the changes materially alter the previous privacy policy. We will not, however, revise our privacy policy to permit the sharing of nonpublic personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

REQUESTS FOR INFORMATION

We direct our Investors or other interested persons who have any questions about our privacy policies or procedures to contact either in writing at 87 Railroad Place, Ste. 403, Saratoga Springs NY 12866, or by email info@randadvisors.com.